# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA **Plaintiffs**,

٧.

Case No. 12-2039 (GAG)

COMMONWEALTH OF PUERTO RICO, et. al.

Defendants.

#### MOTION TO RESTRICT

**COMES NOW** the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau (PRPB), through the undersigned counsel, who respectfully alleges and prays as follows:

- 1. On this same date, the undersigned will file a *Motion submitting translated document*, which consists of the <u>certified translation</u> of the PRPB's official *Response* to the Federal Monitor's Assessment Report (Docket No. 1002) on the incidents involving the May 1st Protests.
- 2. On December 7, 2018, defendants filed a *Motion to restrict* the aforementioned document, which was filed in the Spanish language on that same date (Dockets No. 1043 and 1045, respectively). Such *Motion* was granted by this Honorable Court on December 10, 2018 (Docket No. 1047).
- 3. Therefore, on the same grounds set forth on our previous *Motion to restrict* (Docket No. 1043) and in compliance with Standing Order No. 9, the appearing party respectfully requests that they be allowed to file the certified translation of the aforementioned document under seal and limit its viewing to case participants only.

**WHEREFORE**, it is respectfully requested from this Honorable Court to take notice of the above stated and that they be allowed to file the aforementioned document under seal and limit its viewing to case participants only.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

### RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on January 8, 2019.

## WANDA VAZQUEZ GARCED

Secretary of Justice

#### WANDYMAR BURGOS VARGAS

Deputy in Charge of General Litigation

# SUSANA PEÑAGARICANO BROWN

Director Federal Litigation and Bankruptcy

# S/VALERIE CONCEPCIÓN CINTRÓN

Valerie Concepción Cintrón U.S.D.C. NO. 303002 Federal Litigation Division Department of Justice P.O. Box 9020192 San Juan, P.R., 00902-0192 Tel. (787) 459-2799

vconcepcion@justicia.pr.gov